FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST-9173

LTI, INC.

SUMMARY

LTI, Inc. (LTI) is seeking reissuance of its State Waste Discharge Permit for its Sunnyside, Washington facility. The company cleans the interiors and exteriors of milk tankers that have been emptied at the nearby WestFarm Foods dairy processing plant. LTI's facility is located within the boundaries of the Port of Sunnyside. The Permittee discharges its process wastewater to the Port's Industrial Wastewater Treatment Facility (IWWTF) for treatment and discharge to either the Port's sprayfield or surface water.

Process wastewater discharged to the Port is pretreated in an oil/water separator. The facility discharges up to 95,000 gallons per day to the IWWTF.

Process wastewater discharges to the IWWTF are managed by the Port through a Schedule A User Contract. LTI's user contract with the Port limits flow volume and chemical oxygen demand (COD). The user contract, in turn, is incorporated into Special Condition S1. of the permit by reference. These contract hydraulic and constituent loadings, along with the specified pH limits, constitute the enforceable discharge limitations of the permit.

LTI has generally remained in compliance with the conditions of the existing permit issued in 2000. The proposed permit requires LTI to comply with the specified discharge limitations and submit monthly discharge monitoring reports (DMRs) verifying compliance. In addition, the company is required to submit updates of its Solid Waste Management Plan, Spill and Slug Discharge Prevention and Control Plan, and Operation and Maintenance (O&M) Manual.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-9173. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the Port of Sunnyside Industrial Wastewater Treatment Facility (IWWTF). This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the State is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the State. Regulations adopted by the State include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A--Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix C -- Response to Comments.

GENERAL INFORMATION	
Applicant	LTI, Inc.
Facility Address	125 Alexander Road Sunnyside, WA 98944
Type of Facility:	Tank Truck Cleaning
Facility Discharge Location	Latitude: 46° 18' 00" N Longitude: 120° 00' 53" W.
Treatment Plant Receiving Discharge	Port of Sunnyside IWWTF
Contact at Facility	Name: Allen Gunderson Telephone #: 509-839-5844

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

The facility consists of three wash bays, two enclosed, for interior truck washing and truck maintenance, and the third outside but covered where the exterior of tankers and tractors are cleaned. The facility is typically operated 16 hours a day, 7 days a week, throughout the year.

Washwater is collected in floor drains and directed to a central point. The consolidated stream flows through an oil/water separator, a composite sampler and discharge flow meter before it is pumped to the Port of Sunnyside Industrial Wastewater Treatment Facility (IWWTF). Wastewater is discharged to the Port of Sunnyside IWWTF treatment system for subsequent discharge to either Joint Drain 33.4 or land treatment on the Port's sprayfield.

Stormwaters are collected from roof drains and asphalt areas of the plant and conveyed to the Roza-Sunnyside Board of Joint Control Drain 33.4 (formerly DID 3) that parallels Midvale Road. The Permittee's stormwater discharge is regulated under the State's Industrial Stormwater General Permit No. SO3-001708 and will not be addressed further in this fact sheet.

PERMIT STATUS

The previous permit for this facility was issued on May 26, 2000.

An application for permit renewal was received by the Department on March 18, 2005 and accepted by the Department on April 6, 2005.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

A compliance inspection without sampling was conducted on April 13, 2005.

During the history of the previous permit, the Permittee has generally remained in compliance based on Discharge Monitoring Reports (DMRs) and other reports submitted to the Department and inspections conducted by the Department. One exceedance of the contract limits occurred in 2004, which is described in the next section of this fact sheet. However, the Permittee has occasionally submitted its DMRs late.

WASTEWATER CHARACTERIZATION

Hydraulic and constituent loadings to the IWWTF were reported in the permit application and in discharge monitoring reports (DMRs). The Port manages hydraulic and constituent loadings to its IWWTF through the Schedule A User Contract. The contracted loadings, in turn, function as effluent limits in the State Waste Discharge Permit. However, the contracted loadings are incorporated into this permit by reference, because the contract is occasionally renegotiated and the Department lacks the resources to reissue the permit at every contract revision.

The Port manages loadings to the IWWTF on annual and monthly bases. Loadings in Table 1 are expressed as monthly and annual total gallons or pounds to allow comparison with the contract loadings. The wastewater discharge is characterized for the following parameters:

Table 1: Wastewater Characterization

Parameter	2004 Loadings		Schedule A Loadings	
	Highest Monthly Loadings	Total Annual Loadings	Monthly Contract Loadings	Annual Contract Loadings
Flow, in gallons	368,315	2,034,860	187,013-448,831[a]	2,954,805
Chemical Oxygen Demand (COD), in lbs	10,496	25,889	7,500	90,000
Total Suspended Solids (TSS), in lbs	1,332	5,149	NA	NA
Total Kjeldahl Nitrogen (TKN), in lbs	35	226	NA	NA
Total Phosphorus, in lbs.	72	385	NA	NA
Chloride, in lbs	403	1,000	NA	NA
Total Dissolved Solids (TDS), in lbs	5,884	17,174	NA	NA
Fixed Dissolved Solids (FDS), in lbs	2,265	9,876	NA	NA

a-Flow contract loadings vary from month to month.
NA means not applicable; contract loadings have not been established for these parameters.

As the data presented in the table shows, the Permittee's discharge has been generally well within the loadings specified in the User Contract. The one exceedance of contract limits that occurred during 2004 was for COD discharged to the Port in October. Monitoring for TKN, Chloride, TDS and FDS in the discharge is undertaken by the Port to help quantify loadings to the Port's sprayfield.

The existing permit contains pretreatment pH limits of between 5.0 and 11.0. During 2004 there was one exceedance of these limits, a 3.8 reported in March.

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the IWWTF (local limits). Wastewater must be treated using all known, available, and reasonable methods of prevention, control and treatment (AKART) and not interfere with the operation of the IWWTF.

State and Federal regulations require that the more stringent of the technology-based limits or local limits be applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring all known, available and reasonable methods of prevention, control, and treatment of discharges to waters of the State (WAC 173-216-110). There are no existing State or Federal categorical limitations for this specific industry. However, the Permittee's discharge is subject to the Federal General Pretreatment Regulations, detailed in 40 CFR 403. The purpose of the pretreatment regulations are to prevent discharges that may interfere with the operation of, or bypass, the publicly-owned treatment works. Therefore, the effluent limits in this permit are based on the Permittee's user contract with the Port, which is described in the following section.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the IWWTF from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on Schedule A User Contracts established by IWWTF. Contract loadings are incorporated into this permit as effluent limits by reference. The most recent, Department-approved contract with the Port is dated January 23, 1995. The 1995 contract limits the Permittee's hydraulic and COD loadings to the IWWTF. The contract limits are contained in Table 1 of this fact sheet. The Permittee is required to incorporate the most current, Department-approved User Contract into Appendix A of the Operation and Maintenance (O&M) Manual.

The Department anticipates that pollutant concentrations in the discharge will not cause problems at the IWWTF, such as interference, pass-through, nor will it cause hazardous exposure to IWWTF workers.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Special Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring of Flow, TSS, COD and pH in the discharge is required to verify compliance with the permitted discharge limitations. Monitoring for TKN, TDS, FDS and Chloride is required to aid in managing loadings of these pollutants to the Port's sprayfield and surface water discharge.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The provisions of Special Condition S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE (O&M)

The proposed permit contains Special Condition S5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

The Department received an O&M Manual from LTI in May 2003. The Department approved the manual in December 2003. The Permittee's facility has not undergone any major modifications in recent years; therefore, the existing manual should be adequate for the foreseeable future. The permit requires that, in the event the facility undergoes any modifications affecting the volume or character of wastewater, the Permittee is required to update the manual and submit it to the Department for review.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the State from leachate of solid waste.

The Permittee submitted a Solid Waste Management Plan to the Department in May 2003. The Permittee's facility has not undergone any major modifications in recent years; therefore, the existing manual should be adequate for the foreseeable future. The permit requires that, in the event any modifications occur affecting the volume, character, or disposition of solid waste generated by the facility, the Permittee is required to update the manual and submit it to the Department for review. The plan must also be submitted to the local solid waste permitting agency for approval, if required by local ordinance.

SPILL AND SLUG DISCHARGE PREVENTION AND CONTROL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

In addition, the Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely affect the POTW; therefore, a slug discharge control plan is required (40 CFR 403.8 (f)).

The Permittee has developed a plan for preventing the accidental release of pollutants to State waters and/or the POTW for minimizing damages if such a discharge occurs. The existing plan was submitted to the Department on May 29, 2003. The proposed permit requires the Permittee to update this plan and submit it to the Department. The purpose of the update is for the company to reassess its liquid storage practices and spill response procedures, and incorporate any necessary revisions into the plan. The plan is required to address spills to the environment and the Port's collection system, if applicable.

GENERAL CONDITIONS

General Conditions are based directly on State laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1. requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2. requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3. specifies conditions for modifying, suspending or terminating the permit. Condition G4. requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5. requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6. prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7. and G8. relate to permit renewal and transfer. Condition G9. requires the Permittee to control production or wastewater discharge in order to maintain

compliance with the permit. Condition G10. prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11. requires the payment of permit fees. Condition G12. describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for 5 years.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology.

Laws and Regulations(http://www.ecy.wa.gov/laws-rules/index.html)

Permit and Wastewater Related Information
(http://www.ecy.wa.gov/programs/wq/wastewater/index.html

APPENDIX A--PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

The Department will publish a Public Notice of Application and Draft (PNOA/D) on May 12, and May 19, 2005 in the Sunnyside Daily Sun News to inform the public that an application, draft permit and fact sheet were available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, WA 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30 day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within 30 days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, 509/457-7105, or by writing to the address listed above.

This permit was written by Jim LaSpina.

APPENDIX B--GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the Federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring –Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge

regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--
1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;
2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down

wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the State of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C--RESPONSE TO COMMENTS

No comments were received by the Department of Ecology.